

EXHIBIT 4

DAVID Z. CHESNOFF, CHARTERED
RICHARD A. SCHONFELD, CHARTERED

ROBERT Z. DEMARCO

LAW OFFICES
Chesnoff & Schonfeld
AN ASSOCIATION OF PROFESSIONAL CORPORATIONS
520 SOUTH FOURTH STREET
LAS VEGAS, NEVADA 89101-6593

TELEPHONE
(702) 384-5563

FAX
(702) 598-1425

August 28, 2024

Via U.S. Mail and E-mail

Leo J. Wise
Principal Senior Assistant Special Counsel
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Room B-200
Washington, DC 20530
LJW@usdoj.gov

Re: *United States v. Alexander Smirnov*, 2:24-cr-00091-ODW

Dear Mr. Wise:

I write regarding various recent news accounts of Hunter Biden (the defendant in two separate federal cases) soliciting United States government assistance during the time when President Biden, Hunter's father, served as Vice President of the United States. Specifically, after President Biden abandoned his reelection bid in 2024, the State Department released to the New York Times (in response to a request from 2021) the United States Ambassador in Rome's written response to a letter that Hunter Biden evidently sent to the Italian Embassy in 2016.

According to news accounts published in the New York Times and reprinted by CNN on August 13, 2024, Hunter Biden's letter (which, itself, has not been released) "asked for help from the US State Department as he sought to make a deal for a Ukrainian gas company in Italy while his father was vice president According to the Times, Hunter Biden sent at least one letter to

///



- Page 2 -

the US ambassador to Italy in 2016 on behalf of the company, Burisma, where he was a board member at the time. The outreach, a businessman involved in the project told the Times, came when the company was having difficulty securing regulatory approval for a geothermal project in Tuscany." CNN, *Hunter Biden asked State Dept. for Help Securing Burisma Project in 2016*, <https://www.cnn.com/2024/08/13/politics/hunter-biden-state-department-help-burisma-project> (Aug. 13, 2024).

While we have no doubt that the government will comply with its discovery obligations (including its obligation to produce all exculpatory and impeachment evidence under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny), Mr. Smirnov specifically requests—in view of both the foregoing disclosures and of the Burisma-related allegations in the present Indictment against Mr. Smirnov—that your office review the files referenced in the foregoing disclosures and timely disclose to us any discoverable information, including (but not limited to) exculpatory or impeaching evidence related to Hunter Biden's (or, Mr. Smirnov's) work on behalf of Burisma.

Thank you for your attention to this matter. Please contact me with any questions.

Sincerely,

CHESNOFF & SCHONFELD

(by Ras)
David Z Chesnoff, Esq.